

REMARKS

The present response cancels claims 4 and 16 without prejudice or disclaimer as to the subject matter recited therein. In addition, the specification and claims 1, 8, 9, 13, 17, and 18 have been amended. Claims 1-3, 5-15, and 17-18 remain pending in the captioned case.

Section 102 Rejection

Claims 1-5, 9, and 16-18 were rejection under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,598,048 to Carneal et al. (hereinafter "Carneal"). Claim 16 has been canceled rendering rejection thereto moot. The standard for "anticipation" is one of fairly strict identity. A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art of reference. *Verdegaal Bros. v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987); MPEP 2131. Using this standard, Applicants submit the cited art fails to disclose each and every element of the currently pending claims, some distinctive features of which are set forth in more detail below.

Carneal does not teach or suggest a cache that is internal to, within, or part of a web server. Independent claims 1, 9, 17, and 18 each recite a cache located in a particular location. Specifically, each independent claim recites the claimed cache within a web server. Support for this limitation is found, for example, in originally presented claim 4 and in the specification on page 10, lines 6-31, and page 29, lines 20-22. The specification makes clear that caches can be either internal or external to a web server (Specification -- pg. 10, lines 6-10). However, the present cache is purposely placed internal to the web server itself (Specification -- pg. 29, lines 6-22). If "fragments" of a web page are to be cached, it is desirable to place the cached fragments internal to the web server so that the web server can select particular content or invalidate content as needed.

Contrary to an internal cache, Carneal specifically requires that its cache be an external cache or, more specifically, a cache purposely placed into a proxy server 66 or distributed proxy server 68 (Carneal -- Figs. 5 and 6). By placing the cache within the proxy server, inline objects can be prefetched from the Internet and, when needed, the inline objects can be received on web browser 20 -- "thus, eliminating any extra delay associated with transmission over the Internet 24." (Carneal -- col. 7, lines 6-9; col. 6, lines 36-55.) Clearly, one skilled in the art when reading Carneal would know the difference between a proxy server

66/68 and a web server 26 (Carneal -- Figs. 5 and 6). Moreover, the skilled artisan would also glean from Carneal that it is imperative to minimize traffic over the Internet via wireless link 62, and that the object cache 71 must be situated within the access point 70 associated with a distributed proxy server 68 -- not web server 26 (Carneal -- Figs. 5 and 6). In fact, Carneal specifically states that efficiencies are gained by using data flow as described in Fig. 7 by illustrating block 94 as prefetching inline objects for storage in a caching module for later reference (Carneal -- col. 8, lines 41-43; col. 9, lines 14-16.) Thus, it appears that Carneal purposely teaches away from a cache placed in a web server by requiring the cache be placed in a proxy server.

Carneal does not teach or suggest a cache containing or storing code from a parent server page. Present independent claims 1, 9, 17, and 18 each recite a cache which contains or stores a parent server page as well as a child server page. While Carneal appears to indicate that inline objects (allegedly the child server page) can be stored in object cache 71 (Carneal -- col. 8, lines 41-43), Carneal specifically requires that the parent file not be stored in cache, but forwarded instead to web browser 20 during operation 88 (Carneal -- Fig. 7; col. 8, lines 25-28). Thus, while object cache 27 can temporarily store inline objects, no mention is made or suggestions given whatsoever in Carneal for temporarily storing a parent file (See, e.g., Carneal -- col. 7, lines 63-65). In fact, a skilled artisan following the teachings of Carneal would never choose to cache a parent file since the parent file of Carneal must be executed upon by the web browser in order for the web browser to request the inline object (See, e.g., Carneal -- Fig. 7, operations 90 and 96). If the parent file is cached, then the inline objects could never be requested -- a central and imperative theme of Carneal.

Carneal does not teach or suggest executing the child server page using the link without executing the parent server page. Present claims 2 and 12 each describe execution of code within a child server page, but not execution of code within a parent server page while a link is being employed. Contrary to claims 2 and 12, Carneal appears to mandate that the parent file be received by web browser 20 (Carneal -- Fig. 7, operation 90) before an inline object can be requested. If, somehow, Carneal were to be modified so that the parent file is no longer executed as presently claimed, then a skilled artisan could readily discern that an inline object could never be requested.

Carneal does not teach or suggest a link that comprises a list of request attributes. Present claim 3 further defines the link as comprising a web page address and a list of request attributes. Set forth in the present specification is a definition for such request attributes. Contrary to any request attributes,

Carneal makes clear that the link or so-called reference to an inline object is nothing more than reference to text, digital data file, an image file, a sound clip, or a program applet, etc. (Carneal -- col. 8, lines 10-14). However, nowhere in Carneal is there any suggestion that the link or reference contains attributes of a request or the presently claimed "list of request attributes." Instead of being indigenous to the request, the link or reference of Carneal appears indigenous to the inline object which is the target of a request, not the request itself.

For at least the foregoing reasons, Applicants assert that independent claims 1, 9, 17, and 18, as well as claims dependent therefrom, are not anticipated by the cited art. Accordingly, Applicants respectfully request removal of this rejection.

Section 103 Rejection

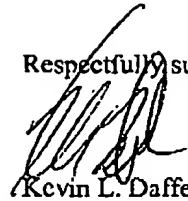
Claims 6-8 and 10-15 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Carneal in view of U.S. Patent No. 6,643,652 to Helgeson et al. (hereinafter "Helgeson"). For at least the reasons set forth above, Applicants reiterate that independent claims 1, 9, 17, and 18, as well as claims dependent therefrom, are patentable over the cited art. Neither Carneal nor Helgeson, either singularly or in combination, teach or suggest the patentably distinct features set forth above. Accordingly, Applicants respectfully request removal of this rejection.

CONCLUSION

The present amendment and response is believed to be a complete response to the issues raised in the Office Action mailed March 25, 2004. In view of the remarks traversing the rejections, Applicants assert that pending claims 1-3, 5-15, and 17-18 are in condition for allowance. If the Examiner has any questions, comments or suggestions, the undersigned attorney earnestly requests a telephone conference.

No fees are required for filing this amendment; however, the Commissioner is authorized to charge any additional fees which may be required, or credit any overpayment, to Conley Rose, P.C. Deposit Account No. 03-2769/5468-05300.

Respectfully submitted,



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